

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

	§	
United States of America,	§	
<i>Plaintiff,</i>	§	Civil Case
vs.	§	(CDCS: 2018A33799)
	§	
Tina Ramirez,	§	
<i>Defendant,</i>	§	
	§	

Complaint

1. Jurisdiction

The District Court has jurisdiction because a federal agency is a party to this action and under the express authority granted to it by the United States Constitution Article III, Section 2, 28 U.S.C. § 1345 (2013).

2. Venue

Venue is proper in the Southern District of Texas, Houston Division, because the defendant resides in Houston and may be served at 1809 Warwick Rd, Houston, Texas 77093. The defendant's process address is located in Harris County. 28 U.S.C. § 1391 (2013).

3. Breach of Contract

a. Defaulted Note

This action seeks recovery of a debt owed to the United States. The defendant has not repaid the debt as agreed. The amount owed includes:

CDCS 2018A33799

Principal	\$ 6,522.01
Interest as of 02/16/2018.	\$ 1,240.41
Attorney's fees	\$ 550.00
Balance due	<hr/> \$ 8,312.42

Interest rate of 3.375% accrued at a daily rate of \$ 00.6.

The certificate of indebtedness, shows the total owed excluding attorney's fees and central intake facility charges. On the date of the certificate the principal and interest shown were correct after credits having been applied.

b. Failure to Pay

Demand for payment has been made by Plaintiff. Defendant has failed to pay the debt.

4. Prayer

The United States prays for the sums of the Balance due in paragraph 3 to include principal, interest, and attorney fees. Plaintiff prays for prejudgment interest through the date of judgment and other fees that the Court deems proper.

Respectfully submitted,

/s/ Clifton C. Kyle

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